

From: Herrick, Jacquelyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=40DA8860B1DD43D9B006AC1E0E9E04CE-MARCHESE, J]
Sent: 1/25/2021 2:58:48 PM
To: Herrick, Jacquelyn [Herrick.Jacquelyn@epa.gov]; Leifer, Kerry [Leifer.Kerry@epa.gov]
CC: Saunders, Jennifer [Saunders.Jennifer@epa.gov]

Subject: Quick PFAS discussion
Location: Microsoft Teams Meeting

Start: 1/25/2021 4:00:00 PM
End: 1/25/2021 4:30:00 PM
Show Time As: Busy

Required Attendees: Leifer, Kerry
Optional Attendees: Saunders, Jennifer

Hi Kerry,

Can we chat real quick this morning about PFAS and Clarke's proposal for a submission to fix the problem?

Clarke asked Ed the following questions. I basically need to know **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

1. RD has previously, for other products and other packaging, required submission of an R340 amendment for a new packaging form. This new package is also HDPE is the same style ("F-style", jerrican, and drum) and volume as current Clarke registrations. **Does the alternate barrier technology for an otherwise identically constructed HDPE container trigger the PRIA submission?** **Ex. 5 Deliberative Process (DP)**
2. If PRIA submission is required, what turn-around time from RD might Clarke expect for its submissions? **Ex. 5 Deliberative Process (DP)**
3. Will it be possible to submit applications for multiple products of similar composition as part of an aggregate package for ease of review? **Ex. 5 Deliberative Process (DP)**
4. Might fees be less for grouped applications of products that reference the same study (i.e., multiple formulations tested in a single study), i.e. R340 and R340.1 with a 25% fee reduction? **Ex. 5 Deliberative Process (DP)**
5. For a study that details stability and corrosion characteristics for multiple products, in CDX/PSP would we upload the study for one registration/action, or would we upload it repeatedly for every product application package? Does EPA have a preference? **Ex. 5 Deliberative Process (DP)**
6. We are submitting data to support a basic registrant's submission for a Clarke branded product that is a supplemental distributor label. How might we connect the submissions for expediency? **Ex. 5 Deliberative Process (DP)**

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